

Response

A. Introduction

Claims 15-24 were pending in the application prior to the preceding amendments, and *claims 16-24* are pending now. The Examiner initially rejected previously-pending claims 15-18 and 20 as anticipated by commonly-owned U.S. Patent No. 6,062,134 to Grace, et al. and claims 19 and 21-24 as obvious in view of combined disclosures of the Grace patent and International Patent Application Publication No. WO 01/34516 of Italiane, et al. Applicants disagree.

In particular, Applicants believe the Examiner has failed to establish *prima facie* basis for rejecting at least claims 16, 22, and 24. Accordingly, they have rewritten claim 16 in independent form, clarified claims 17-18, and revised dependencies of claims 19-21 and 23. *No substantive amendment to independent claim 16 has been made.*

B. Claim 16

As both originally and currently drafted, claim 16 details an inflatable system including an inflatable component with at least first and second chambers. The system additionally includes at least *first and second charges for generating inflating gas*, with the first charge disposed in the first chamber and the second charge disposed in the second chamber. According to the claim, the inflatable component is inflated such that the first and second chambers inflate with different deployment characteristics. *Further, the first and second charges themselves--i.e. the things that generate the inflating gas--also "have different deployment characteristics."*

Applicants agree with the Examiner that Figs. 5 and 5a of the Grace patent illustrate multiple sections of an inflatable component and that each of charges 51a, 51b, and 51c generates inflating gas within its respective section. Applicants further agree that, according to the Grace patent, the multiple sections of the component may be deployed sequentially--and therefore differently. Clear, however, is that different deployment of the multiple sections is *not* caused by *gas-generating charges 51a, 51b, and 51c* having different deployment characteristics. Rather, sequential deployment of the multiple sections is caused by *strips 53a, 53b, and 53c having different characteristics* (for the version of Fig. 5) *or through use of multiple initiators* (for the version of Fig. 5a). See Grace, col. 7, ll. 25-40 (discussing Fig. 5); *id.*, ll. 41-60 (discussing Fig. 5a).

Stated differently, the invention of claim 16 relies on *the gas-generating charges* as having different deployment characteristics. By contrast, the system of Fig. 5 of the Grace patent relies on *non-gas-generating strips* as having different deployment characteristics. Indeed, the Grace patent is *silent* as to *any* differences in deployment characteristics of gas-generating charges 51a, 51b, and 51c. This likewise is true for the system of Fig. 5a, as multiple initiators are used to control deployment in it. For at least these reasons, therefore, Applicants request that claims 16-24 be allowed.*

*Moreover, given that the systems of the Grace patent achieve different sectional deployments via multiple initiators or differences in strips 53a-c, having non-uniform deployment characteristics of gas-generating charges 51a-c could undermine these results rather than facilitate them.

C. Claim 22

Referenced in claim 22 is a system in which the initiator ignites first, second, and third charges simultaneously. As noted above, (at least) the first and second charges generate inflating gas. The third charge is described (in claim 21) as “maintaining the inflation of the inflatable component.”

According to the Examiner, the Italiane application (somehow) “clearly discloses the features and components” of claim 22. See Office Action at p. 2. The Examiner identifies *no support whatsoever* for this contention, merely directing Applicants to the entirety of the “Detailed Description” of the Italiane application and to its Figs. 1-3. This approach of the Examiner not only fails to establish a *prima facie* basis for rejecting claim 22, it also is factually incorrect.

Indeed, *nowhere* in the Italiane application can Applicants locate *any* disclosure of an initiator igniting three charges simultaneously, with at least two of the charges generating inflating gas. Nor, for that matter, is this sort of structure detailed in the Grace patent. Although Fig. 5 of the Grace patent illustrates single initiator 54, it simultaneously ignites strips 53a, 53b, and 53c--and does *not* simultaneously ignite charges 51a, 51b, and 51c. Hence, for at least these reasons, no basis for rejecting claim 22 exists as well.

D. Claim 24

Claim 24, finally, recites a system in which a fourth charge functions as a booster (per claim 23) and “is compressed in a container and the container is placed around the initiator.” The Examiner contends that, because booster charges are “well known in the art,” it would have been obvious to include one in the systems of the

Grace patent. See Office Action at p. 3. However, even assuming (*arguendo*) that the Examiner is correct, this would **not** suggest placement of the booster charge around the initiator and compressing it in a container--as recited in claim 24. Again, therefore, the Examiner has wholly failed to establish a *prima facie* basis for rejecting claim 24, and Applicants request that the claim be allowed.

Conclusion

Applicants request that the Examiner allow claims 16-24 and that a patent containing these claims issue in due course.

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Respectfully submitted,



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